1 Magistrate Judge Theresa L. Fricke FILED \_ LODGED 2 \_RECEIVED 3 09/14/2021 CLERK U.S. DISTRICT COURT 4 WESTERN DISTRICT OF WASHINGTON AT TACOMA 5 6 7 UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON 8 AT TACOMA 9 10 CASE NO. 3:21-mj-05190 UNITED STATES OF AMERICA, 11 Plaintiff COMPLAINT for VIOLATIONS 12 13 18 U.S.C. § 2251(a) V. 14 STEPHEN RIAN PRICE 15 Defendant. 16 17 BEFORE, The Honorable THERESA L. FRICKE United States Magistrate 18 Judge, United States Courthouse, Tacoma, Washington. 19 The undersigned complainant being duly sworn states: 20 COUNT 1 21 (Production of Child Pornography) 22 On or between July 1, 2019 and October 16, 2019, in Clark County, within the 23 Western District of Washington, and elsewhere, STEPHEN RIAN PRICE, knowingly 24 employed, used, persuaded, induced, enticed, and coerced MV1, a minor, to engage in 25 sexually explicit conduct, and attempted to do so, for the purpose of producing a visual 26 depiction of such conduct and transmitting any live visual depiction of such conduct, 27 knowing or having reason to know that such visual depiction would be transported and 28

United States v. Price 2020R00360

COMPLAINT- 1

UNITED STATES ATTORNEY 1201 PACIFIC AVENUE, SUITE 700 TACOMA, WASHINGTON 98402 (253) 428-3800

transmitted using any means or facility of interstate and foreign commerce, such visual depiction was transported and transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a), (e).

#### **COUNT 2**

### (Production of Child Pornography)

On or about August 21, 2019, in Clark County, within the Western District of Washington, and elsewhere, STEPHEN RIAN PRICE, knowingly employed, used, persuaded, induced, enticed, and coerced MV2, a minor, to engage in sexually explicit conduct, and attempted to do so, for the purpose of producing a visual depiction of such conduct and transmitting any live visual depiction of such conduct, knowing or having reason to know that such visual depiction would be transported and transmitted using any means or facility of interstate and foreign commerce, such visual depiction was transported and transmitted using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce, and such visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a), (e).

# AFFIANT BACKGROUND AND EXPERIENCE

1. I am a Task Force Officer (TFO) with the United States Department of Homeland Security, Homeland Security Investigations (HSI), in Portland, Oregon. HSI is responsible for enforcing the customs laws, immigration laws, and federal criminal statutes of the United States. I am a law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and I am authorized by law to conduct investigations and to make arrests for felony offenses. I am also a

Detective with the Vancouver Police Department (VPD), where I am assigned to the Digital Evidence Cybercrime Unit (DECU).

2. I have been a law enforcement officer for 13 years and was commissioned in 2019 as a TFO for Homeland Security Investigations. I have been involved in investigations of child exploitation and pornography for the past 3.5 years. My duties include the enforcement of federal criminal statutes prohibiting the sexual exploitation of children, including Title 18, United States Code, Sections 2251 through 2259, the Sexual Exploitation of Children Act (SECA), and Title 18, United States Code. I have participated in the execution of search warrants involving child exploitation and/or child pornography offenses, and the search and seizure of computers and other digital devices. My agency is an affiliate member of the Seattle Internet Crimes Against Children (ICAC) Task Force in the Western District of Washington. I work with other federal, state, and local law enforcement personnel in the investigation and prosecution of crimes involving the sexual exploitation of children.

### PURPOSE OF THE AFFIDAVIT

- 3. The information contained in this Complaint is based on my own personal knowledge, information provided by other law enforcement officers familiar with the investigation, reports and other records associated with this investigation, statements of witnesses with personal knowledge, and my training and experience.
- 4. Because this Complaint is intended to establish that there is probable cause to believe that the defendant named above committed the offcnsc(s) charged, I have listed only those facts that I believe are necessary to establish probable cause. I do not purport to list each and every fact known to me or other law enforcement officers as part of this investigation.
- 5. As further detailed below, based on my investigation and the investigation of other law enforcement officers, I submit there is probable cause to believe that

STEPHEN RIAN PRICE has committed the violation(s) of Production of Child Pornography (two counts).

# **SUMMARY OF THE INVESTIGATION**

- 6. On October 16, 2019, investigators with the VPD-HSI-DECU received multiple investigative leads from the National Center for Missing and Exploited Children (NCMEC). Two of the cybertips were "Priority Level: 1," meaning the tips indicated current or imminent risk to an individual existed. The information provided by NCMEC reports indicated the suspect, later identified as PRICE, used the social media platforms Discord and Dropbox to distribute images and videos of himself engaging in sexual acts with a minor victim, hereinafter MV1.
- 7. Discord is an electronic service provider (ESP) based in San Francisco, California. Discord was originally designed to be used by the video gaming community. A Discord user can send text messages, images, video and audio communication to other users in a "chat channe.!"
- 8. Dropbox is an electronic file hosting service based in California. Dropbox creates a special folder on a user's computer or portable device that can then be synchronized with multiple devices allowing the user (or other users the subject has given permission) to make changes. These alterations can include but are not limited to adding or deleting files and sharing files such as photographs and videos. These changes would take place on all devices. Dropbox is available as a computer website or portable device application. Users can start a free account with an email address. With a paid version of the software the user is provided more options such as digital storage space.
  - 9. The following information was contained in the Discord cybertip: "ESP Escalation: Is a family member, parent to child. This was our only known avenue to report and escalate. User appears to be actively molesting child and discusses that this will be an ongoing occurrence."

- 10. Discord further advised on October 15, 2019, at 20:48:17 UTC, a user with the Google controlled email address of mankiller231@gmail.com and screen name of xenshi666#6973 had uploaded a video file of child pornography through a DISCORD chat room.
- 11. The video DISCORD reported is approximately 4 minutes long. It depicts a female infant who is approximately a few months old. The child is fully nude and is placed on her back. An adult hand is keeping the baby in place by separating the child's legs, fully exposing the child's genitalia. The child is then anally penetrated by an adult's erect penis.
- 12. This video was reported along with a series of messages the user was sending over DISCORD speaking about the abuse. Due to information suggesting the suspect was actively sexually abusing an infant, emergency request orders were provided to Comcast Cable Communications and Google INC for identifying information associated with the IP address used to upload the video and the email address (mankiller231@gmail.com) provided to Discord.
- 13. From Comcast, investigators received subscriber information identifying the responsible person or business for the IP address used to upload the video as "Rama Biller," located at 544 6<sup>th</sup> Street, Washougal, Washington. The Rama Inn motel is located at this address.
- 14. The information provided by Google listed the user of the account with a name of Stephen Price Klein. Associated with this user were additional backup emails of mankiller231@yahoo.com, sprice360@yahoo.com and xenshi666@gmail.com. Google also provided the screen name "Stephen Corleone." Investigators located a Facebook profile under the name "Stephen Corleone" with a picture of PRICE.
- 15. During this investigation the help of the Washougal Police Department was utilized. They located a call history to the Rama Inn involving a Stephen Price, staying in room 141. Washougal PD also located another prior call from room 141 at the Rama Inn

- 16. On October 16, 2019, investigators authored and executed a search warrant for the room 141 of the Rama Inn, as well as the devices contained within the room, and for PRICE's person.
- 17. Investigators contacted PRICE, his wife, his mother and MV1 inside the motel room they all shared. MV1, who was 11 months old at the time, was placed into protective custody.
- 18. Post-Miranda, PRICE admitted to using a laptop found in the residence for gaming and using Discord. He admitted to having four different Discord accounts all of which were some form of the screen name xenshi666. When asked, PRICE said investigators would not find anything inappropriate on his laptop. PRICE then said investigators would find approximately three photos of another one of his daughters. He stated these photos were taken approximately two to three years prior and were taken for documentation/medical purposes as he believed his daughter was being sexually assaulted. When asked what made him believe his daughter was being sexually assaulted, PRICE said her genitals were redder than normal.
- 19. When shown a sanitized image from the video Discord had provided, described above, PRICE immediately recognized the infant as his daughter. When asked whose hand was in the photo, Price presented both his hands and admitted it was his hand. PRICE further identified the furniture in the photo, confirming it was the hide-abed in the motel room. PRICE initially denied abusing his daughter, but when shown another image from the video containing his hand he said, "What do you want me to say?! I fucked her in the ass and came on her face!" He further added that he was "sick in the head," demonstrating this by tapping on the side of his head. PRICE admitted he had anal sex with MV1 four separate times.

- 20. Additionally, PRICE was questioned about other images reported in the Discord cybertip. Specifically, one that appeared to be MV1 in a bathtub with an adult's erect penis next to the infant's face. The infant has a semen-like substance stuck to its cheek and chin area. PRICE admitted the images of the infant in the bathtub depicted him and MV1. He denied placing his penis in her mouth but admitted he ejaculated on her face and some semen entered her mouth.
- 21. PRICE was asked how he was able to commit his acts living with two other adults in such a confined space. PRICE said he would abuse MV1 when his wife and mother were at the store or at the doctor's office. He claimed the video and images of MV1 in the bathtub were taken during the summertime. He later admitted to having sex with MV1 approximately three weeks prior. PRICE admitted to recording the abuse using his cellular phone, later found to be a LG K 20 Plus, which is manufactured in South Korea and Vietnam. PRICE said he deleted the materials after his Discord account was shut down.
  - 22. During the interview, PRICE wrote the following to MV1:

Dear [MV1],

I'm sorry I sexually assaulted you I never should have Let it happen. I am sorry I came on your face and fucked you in the butt. I wish I could see you grow up. I Love you and will always be thinking of you.

Love,

Dad (Stephan Rian Price)

23. When investigators asked PRICE what other material was on his laptop, he stated he performed oral sex on a toddler boy (hereinafter MV2) and recorded it. He said MV2 is the son of a female acquaintance from the hotel. PRICE said he believed the assault occurred sometime in June or July 2019, when his wife and MV2's mother stepped out for a cigarette. PRICE said MV2 "needed a diaper change," during which he

took two pictures. One photo depicted MV2's genitals and the other photo depicted PRICE putting his mouth on MV2's penis. This latter instance of oral sex was recorded using the same LG phone. PRICE stated he uploaded the video depicting MV2 to Dropbox but later deleted it sometime in July or August.

- 24. An analysis of the images/videos reported by DROPBOX (another platform used by PRICE and additional ESP reporting to NCMEC) was found to contain images of MV1 and MV2 and are described as follows.
- a. File Name: 20190920\_092712: This video is four minutes, 26 seconds in length, and depicts PRICE inserting his erect penis into MV1'S anus as she screams in pain. The EXIF data recorded this incident on September 20, 2019
- b. File Name: scv\_1565377996031-1: This video is approximately 19 seconds in length and depicts PRICE inserting his erect penis into MV1's anus. The EXIF data recorded this incident on August 9,
- c. File Name: scv\_1563484771390(1) AND scv\_1563484867651(1): These two videos both depict PRICE in a bathtub with MV1. The first video depicts PRICE masturbating in front of MV1's face. The second video depicts PRICE placing his penis into MV1's mouth while masturbating, ultimately ejaculating into her mouth and on her face. EXIF data recorded this incident to have started on July 18, 2019.
- d. File Name: scv\_1566447696403-1: This video is approximately 19 seconds in length and depicts PRICE placing his mouth MV2's penis. The EXIF data recorded this incident on August 21, 2019.
- 25. Also included in the DROPBOX responsive material are two photos depicting PRICE's hand separating MV1's buttocks, clearly exposing MV1'S anus and vagina.
- 26. Investigators sent a search warrant to Discord for PRICE's communications and content with other users between October 15, 2019 and October 16, 2019. Included in the responsive material was the following exchange:

1	xenshi666#6973 As long as he is hard and I get them positioned properly if he is
$_{2}\Vert$	well hung it will work just fine
3	xenshi666#6973 Hahaha as soon as he is home from the hospital I'm gonna be
	sucking his dick while baby mom is getting daughter wet and lubbed and we are
4	gonna make them fuck
5	xenshi666#6973 I'm happy its a boy
6	sirlancelotto#7068 ah well
7	xenshi666#6973 Its a boy sirlancelotto#7068 here's hoping for another daughter amirite
	Heartless<3#1504 Yeah your guys will
8	xenshi666#6973 Its ok me and her will get through it and be better off
9	Heartless<3#1504 I???m sorry to hear that
10	Heartless<3#1504 Oh no
	xenshi666#6973 Yeah it sucks ive been withher 8 years and since she is also
11	currently pregnant as well they may be taking the baby sooner than we want Heartless<3#1504 Oh damn
12	xenshi666#6973 Baby momma will eventually be invoked she will be doing the
13	recordings when she is ready to however idk how involved she will be cuz she has
	cancer
14	ajinx219#7909 <@523397332717404173> right?!
15	devi_454#3281 <@544783841206992896> great stuff. Would be great to get ur
16	bby mama in it too
17	ajinx219#7909 I'm still learning discord??? kokuzan#5567 Finally got your channel lol
	<b>xenshi666#6973</b> Thank you <@632982375206223873>
18	ajinx219#7909 <@544783841206992896> fucking love it lol js.
19	<b>xenshi666#6973</b> Thank you <@632982375206223873>
20	ajinx219#7909 <@544783841206992896> super hawt
	ajinx219#7909 Hot
21	xenshi666#6973 Not very often sadly <@626897837795311617> alone#2822 How often are you alone <@544783841206992896>
22	xenshi666#6973 If I was alone right now I'd be getting more stuff of her
23	purplepineapple#8563 ????
	xenshi666#6973 Hopefully I don't get reported again
24	xenshi666#6973 Haha more than most
25	purplepineapple#8563 <@544783841206992896> That's still more than most of
26	us ????
	xenshi666#6973 I've fucked her maybe 4 times <@626945012252409909> xenshi666#6973 Not very often
27	purplepineapple#8563 <@544783841206992896> How often do you fuck her?
28	COMPLAINT: 9 UNITED STATES ATTORNEY
ы	United States v. Price 1201 Pacific Avenue, Suite 700 Tacoma, Washington 98402

United States v. Price 2020R00360

Tacoma, Washington 98402 (253) 428-3800

incestlover212#5295 ????

xenshi666#6973 I bet

DisneysMoneyPit#0728 Wish I could share her with you

xenshi666#6973 1 VIDEO SENT OF INCIDENT 1

xenshi666#6973 She doesnt cry anymore when I'm fucking her ass

DisneysMoneyPit#0728 She???s gonna be addicted to your cum **xenshi666#6973** And not even a year old yet

DisneysMoneyPit#0728 Such a good little girl

xenshi666#6973 2 IMAGES SENT OF INCIDENT 4 xenshi666#6973 1 IMAGE SENT OF INCIDENT 1

Pok??cord#4503

xenshi666#6973 Ok it told me when I tried posting pics I didn't have permission to do so

- 27. PRICE's wife (MV1's mother) was approximately seven months pregnant with a boy when PRICE engaged in these DISCORD communications.
- 28. When investigators searched PRICE's phone, they found the following exchange saved in the "memo application".

"Are you gonna start up the collection again?

Only if you want togo through with the plan

How would it really work with your mom living in the same Damn room? And there couldn't be any penetration or else risk losing her...

Bath time and when noms sleeping and penetration would come later Much later cause I'll kill myself if we lose her...

It wouldn't be until she's like 2 or 3 that I start penetration"

- 29. This note had a creation date of November 22, 2016.
- 30. Since PRICE's arrest, additional tips have been submitted to NCMEC regarding recipients of PRICE's sexually explicit material depicting MV1. These subjects have been found to be living all over the world.
- 31. The videos depicting PRICE inserting his penis into MV1 have been located in at least two other investigations. On March 5, 2020, investigators received an email from NCMEC that law enforcement in Toronto, Canada had located a screen shot of a "visually similar" image of "the same video" on a suspect's cellular device during an COMPLAINT- 10

unrelated investigation. Due to the videos now being confirmed as a distributed "series," NCMEC listed MV1's images with the series name "Tan&Teal." Recently (Spring 2021), one of the Vancouver Police Department's digital forensic investigators located the video of PRICE sexually abusing MV1 on a suspect device unrelated to this case.

#### CONCLUSION

- 32. Based upon the evidence gathered in this investigation as set out above, including but not limited to my review of data and records, information received from other law enforcement agents, and my training and experience, there is probable cause to believe STEPHEN RIAN PRICE committed the offenses charged in this Complaint.
- 33. Under Federal Rule of Criminal Procedure 4.1, this complaint is presented by reliable electronic means

Chadd Nolan, Complainant,
Task Force Officer
Department of Homeland Security
Homeland Security Investigations

Based on the Complaint and Affidavit presented by reliable electronic means and sworn to me, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

Dated this 13<sup>th</sup> day of September, 2021.

THE HON. THERESA L. FRICKE United States Magistrate Judge

Theresal Fryde

COMPLAINT- 11

United States v. Price 2020R00360